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(94)

October 8, 1999

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Dear Sirs:

I urge the Petition filed by U P C to  
ban forced molting be granted.

Thank you.

Sincerely,  
Scott Douglas



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**order for your letter to be counted**, write to the Department of Agriculture and the Food & Drug Administration:

**For US Dept of Agriculture: DOCKET No. 98-045N**

USDA/FSIS Hearing Clerk  
300 12th Street, SW  
Room 102 Cotton Annex  
Washington DC 20250-3700

**For FDA: DOCKET No. 97N-0074**

FDA/Dockets Management Branch (HFA-305)  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

**For electronic submission: DOCKET NO. OPP-00550**  
oppts.homepage@epa.gov

Electronic comments must be submitted as a ASCII file avoiding use of special characters and any form of encryption.

- Urge the US Food & Drug Administration to grant United Poultry Concerns' petition to ban forced molting. Citing DOCKET NO. 98P-0203/CP1, write:  
Dockets Management Branch  
Food and Drug Administration  
Department of Health & Human Services  
12420 Parklawn Drive, Room 1-23  
Rockville, MD 20857

**Feed withdrawal from turkeys and chickens "has long been shown to markedly increase contamination with both Salmonella and Campylobacter. The birds look for other food sources during feed withdrawal, eating litter [the contaminated material the birds are forced to live in] when they are hungry." Since hens being starved in their cages do not have access to litter, they are driven to "pluck and consume" cage mates' contaminated feathers (Avian Diseases 1995, 39:248).**

*- Food Chemical News, July 26, 1999, reporting on a recent meeting of the National Turkey Federation*

## AMERICAN VETERINARY MEDICAL ASSOCIATION BETRAYS VETERINARIAN'S OATH

to "use my scientific knowledge and skills for the benefit of society through the [promotion of public health], protection of animal health, and the relief of animal suffering."

**"We have an obligation to provide proper care even if the economics do not support it."**

**- William B. Chase, DVM, Symposium on Poultry Management and Production, July 11, 1999**

Instead of leading the campaign to ban forced molting, the AVMA continues to betray its Oath in favor of cruel economic practices that the AVMA's own research has shown to be inhumane and disease-producing. At its House of Delegates meeting in July, the AVMA vetoed a resolution to upgrade its policy statement endorsing forced molting to a policy of opposition to forced molting. The AVMA has been besieged by the public, thousands of veterinarians, and virtually the entire animal protection community in response to the national campaign being waged by United Poultry Concerns and the Association of Veterinarians for Animal Rights to end forced molting.

Out of career interests the AVMA has intentionally deceived the public, betrayed the birds, and betrayed its own moral and intellectual integrity by falsely comparing the deliberate starvation of hens in confinement to hens who are sitting on eggs in a state of motherhood. However, a brooding hen does not lose her immune function and get sick in order to become a mother, as do

hens being starved in their cages. Nor does a brooding hen forego food entirely. A brooding hen (a hen sitting on eggs) leaves her nest every day for 10 to 15 minutes to stretch, eat, drink, and defecate. If mother hens lost their immune function and developed diseased reproductive systems as do hens being force molted, chickens would have become extinct a long time ago. Individual members of the AVMA confided to United Poultry Concerns their personal disgust with the association's miserable stand on forced molting at the Symposium on Poultry Management and Production that was part of the AVMA's annual meeting in July.

## "What Can I Do?"

- Tell the AVMA to oppose the withholding of food from hens for any length of time. Tell the association to live up to its oath to protect public and animal health and relieve animal suffering. Write to:

Richard C. Swanson, President  
American Veterinary Medical Association  
1931 North Meacham Rd, Suite 100  
Schaumburg, IL 60173-4360



# Starving Hens For Profit Has Got to Stop

by Karen Davis, Ph.D. and Nedim Buyukmihci, V.M.D.

Recently a woman described the shock she experienced while touring an egg factory in Pennsylvania. When the lights were switched on in one of the blacked-out houses, the voices of the hens inside "rose to a cacophony, accompanied by the sound of thousands of beaks pecking on metal. The hens stuck their heads in and out of the cages, pecking at the feed trays, which were empty." The manager explained that this was the first day of a seven-day "fast." The hens were upset because they expected to be fed; by the end of seven days they would be quieter. After losing up to 30 percent of their bodyweight, denuded of feathers, starved, and deranged by fear, they would be stupefied or dead.

If the average person decided to withhold food from their dog or cat for days or weeks, that person would probably be charged with cruelty to animals and the news media would take the story and run with it. Yet, each year the egg industry intentionally deprives millions of hens of food for up to 14 days. But the cameras aren't rolling on the hens' behalf and no one is going to jail. This speaks volumes about the way our society views animals used for food. These animals are unprotected against the cruelest practices. Only consider that 98 percent of hens used in egg production in the United States are painfully debeaked and crammed into cages so small they can't assume a single normal body posture.

The practice of starving hens

for profit is known as forced-molting. Molting literally refers to the replacement of old feathers by new ones. In nature, birds replace all their feathers in the course of a year to maintain good plumage at all times. A natural molt often happens at the onset of winter, when nature discourages the hatching of chicks. The hen stops laying eggs and concentrates her energies on staying warm and growing new feathers.

The egg industry exploits this natural process by forcing an entire flock to molt simultaneously. This is done to manipulate the marketplace and to pump a few hundred more eggs out of exhausted hens when it is deemed cheaper to "recycle" them rather than immediately slaughter them after a year of relentless egg-laying on a calcium-deficient diet.

To trigger the physiological shock of the forced molt, a University of California poultry researcher (Donald Bell) recommends the removal of all food for no less than five days and as long as fourteen days. Survivors may be force-molted two or three times, based on economics. At any given time over 6 million hens in the U.S. are being systematically starved in their cages, according to the U.S. Department of Agriculture. Dr. Peter Dun, an animal scientist from Scotland, said hens are force molted in the United States "until their combs turn blue."

Forced molting should be banned in this country as was done in Great Britain in 1987. In addition to being cruel and

immoral, it causes disease. Forced molting is a major cause of *Salmonella* poisoning. USDA studies reported in *Poultry Science* show forced molting in combination with a *Salmonella* infection created an actual disease state in the alimentary tract of tested hens. Prolonged food deprivation wrecks the hens' immune system, making them prey to the poisonous bacteria that infest the packed confinement buildings in which they lay their eggs.

Currently, there is not a single federal law in the United States to protect poultry from the most outrageous forms of abuse. For this reason, two nonprofit animal advocacy organizations, United Poultry Concerns and the Association of Veterinarians for Animal Rights, have developed a petition urging the egg industry to take immediate steps to eliminate the cruel practice of forced molting. To date, the industry relies on the notion that Americans couldn't care less how a farm animal is treated. Public pressure is crucial. Readers wishing to receive more information, including a copy of the petition to stop the forced molting of laying hens, are encouraged to write to United Poultry Concerns, PO Box 59367, Potomac, Maryland 20859; and the Association of Veterinarians for Animal Rights, PO Box 208, Davis, CA 95617.

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# Another way—Hog farming without confinement

by Tom Frantzen

Farrowing and finishing hogs has been a core activity on the Frantzen farm for over 55 years, spanning my and my father's farming careers.

In 1978, I changed the way hogs were housed and raised at our farm. A room in our barn was remodeled to hold 14 steel farrowing crates with slat floors. A small underground pit was dug to catch the pig's waste. I distinctly remember how those "modern improvements" changed the very nature of our farm. Slat floors and the stagnant watery manure beneath it created a repulsive odor. Any activity that stirred this fecal soup greatly increased the smell. At that time, I thought that this was just a part of being modern. Noxious odors were not the only bad features of the slat floors and crates. For the next 13 years, I would struggle with countless animal health problems associated with slat floors.

Sows in the crates would slip on the (very expensive!) slat flooring, causing various injuries. Little pigs suffered knee abrasions from sleeping on the hard floors. Pneumonia and injury related health problems were common. The finishing pigs that were closely confined in a slat floored pen, as recommended by modern textbooks on pork production, did gain weight quickly, but they exhibited cannibalistic behavior. Tail biting became a serious problem.

In 1994, my wife, Irene, and I spent two weeks touring Sweden with a small group from Iowa and Minnesota. The trip was organized and hosted by Marlene Halverson of the Animal Welfare Institute and Mark Honeyman of Iowa State University. The farms we visited were employing deep bedded facilities to provide for low stress, humane conditions for their livestock. I was awed by the healthy and content disposition of the stock, and the farm families too!

Every time I observed my old, crowded, slat floor hog barn and the stressed pigs living in it, I too became stressed. Their social brutality (tail biting, bar chewing) was caused by failing to meet their basic social instincts. On a hoopbuilding tour, I was told that a pig has three desires; they want to run around, build a nest, and chew on something. This behavior is impossible in a metal pen on a slat floor. Early one September morning, I opened the door of my grower barn to check on the pigs. One of the pens was covered with fresh blood. Their level of stress was so high they began to cannibalize each other. I could take no more! I announced with a bit of profanity that my slat floor days were going to end.

Deep bedded hoophouse facilities appeared in the Midwest in the mid 1990s. It was exciting to observe this development. Not since being on the Swedish farms had I observed a humane shelter! More exciting yet, was the promise of an economical and ecologically sound building. In a hoophouse or structure, straw bedded pens replace metal crates and slatted floors. The straw bedding mixes with the hog waste which is self composting, creates very little odor and no ecological hazards. Plans were set to build three hoophouses on the farm. By September of 1997 one of the houses was ready for the pigs. I was very anxious to use the new facilities. On moving day we bedded the new hoophouse with fresh straw, and lots of it. One hundred and sixty pigs from the old grower were released into their new home. Boy did those pigs have fun! In the new hoopbuilding they have lots of room to run, straw to chew and heaps of bedding to nest in. They ran around all day—and even into the night. The next morning when I went into check on them, I will never forget what I found. As I walked up to the door, it was quiet, very quiet. I peeked into the hoophouse to see 160 pigs in one massive straw nest, snoring with great content! I laughed until I cried. Their stress was gone and so was mine.

Our deep bedded buildings are now a year old. We are selling the second group this fall. We have not observed any social behavior problems. Even when the bedding pack is four foot deep, the odor level is very low. Nutrient losses from rain and snow runoff is nearly nonexistent. Hoopstructure housing is the most significant development I have observed in moving agriculture towards practices that really make sense. It took a long time but our pigs finally have a happy home.

*Tom Frantzen is a hog farmer from New Hampton, IA.*